

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

HANK CAMPBELL

PLAINTIFF

VS.

CIVIL ACTION NO. 3:23-cv-130-HTW-LGI

MAKERSTAR CAPITAL, INC.; JEFFREY BELL,
IN HIS OFFICIAL CAPACITY AS A REPRESENTATIVE
OF MAKERSTAR CAPITAL, INC.
AND DOES 1-10
DEFENDANTS

MOTION TO WITHDRAW AS COUNSEL
FOR MAKERSTAR CAPITAL, INC.

Undersigned counsel, John E. Wade, Jr. and Alston F. Ludwig of Brunini, Grantham, Grower & Hewes, PLLC hereby move the Court for leave to withdraw as counsel of record for Defendant Makerstar Capital, Inc. ("Makerstar") in the above-styled matter, to have their names removed from the service list, and to be relieved of all further responsibilities for Makerstar. As grounds, the undersigned would show unto the Court the following:

1. Due to a breakdown in communication and understanding between undersigned counsel and Makerstar, it is now impossible for said attorneys to effectively represent Makerstar in this matter.

2. Counsel have taken reasonable steps to avoid any foreseeable prejudice to the rights of Makerstar. Undersigned counsel has written Makerstar multiple times by email regarding the status of this matter, and explained that counsel and their law firm would be forced to seek withdrawal if Makerstar continued ignoring efforts to communicate. Counsel's efforts to communicate with Makerstar have proven unsuccessful.

3. Counsel have good cause to make this motion. *See, e.g., Caterpillar Financial Servs. Corp. v. Turner*, Civil Action No. 3:16-cv-089-MPM-RP at Doc. No. 56 (N.D. Miss. Mar. 22, 2017) (granting withdrawal based on client's failure to communicate with counsel).

4. This case is not presently set for trial.

5. Notice of this motion is being mailed to Makerstar at their last known addresses pursuant to Local Rule 83.1(b)(3).

6. In light of the straightforward nature of this motion, undersigned counsel requests that the Court waive the requirement in Local Rule 7(b)(2) of a separate supporting memorandum.

Wherefore, undersigned counsel requests that this Court enter an Order allowing John E. Wade, Jr. and Alston F. Ludwig of Brunini, Grantham, Gower & Hewes, PLLC to withdraw as counsel for Makerstar.

Dated: September 9, 2024.

MAKERSTAR CAPITAL, INC.

By: /s/ John E. Wade
John E. Wade
One of Their Attorneys

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be electronically filed the foregoing pleading or other paper with the Clerk of the Court using the ECF system which sent notification of such filing all counsel of record.

Dated: September 9, 2024.

/s/ John E. Wade
John E. Wade